

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF IOWA
WESTERN DIVISION

~~~~~

**MOTION FOR SANCTIONS AGAINST  
ATTORNEY JOEL ROBBINS**  
28 U.S.C. § 1927

This was done in response to a subpoena issued by Joel Robbins (3) months after close of discovery in this instant case, using the inherent authority of this Court.

This subpoena was issued for no valid purpose by attorney Joel Robins.

**PLEASE SEE DOC 149 EXHIBIT A**

Richeson has made repeated attempts to conference with Joel Robbins & gain compliance from Joel Robbins, to no avail.

Instead, Joel Robbins attempts to extort \$6000.00 from Richeson or he will give a Federal witnesses personal information to his clients in attempt to extort and intimidate a federal witness in violation of 18 USC 1512.

This Court has an absolute duty to act.

Joel Robbins improperly uses the subpoena process to harass and intimidate Richeson, and should be sanctioned by this Court.

A motion for sanctions must be made separately from any other motion, and must describe the specific conduct that allegedly violates Rule 11(b).

The motion must be served under Rule 5, but it must not be filed or be presented to the court if the challenged paper, claim, defense, contention, or denial is withdrawn or appropriately corrected within 21 days after service or within another time the court sets.

Joel Robbins issued his subpoena on Richeson on March 27th 2017, using this Courts inherent authority to issue it.

21 days has elapsed, and Joel Robbins did not withdraw his subpoena and refuses to destroy the data contained on those 15 hard drives.

This case was essentially dismissed on April 19th 2017 sua sponte under local rule 41.1(c).

Joel Robbins conduct is both egregious and unconscionable.

Joel Robbins is ripe for sanctions and should be sanctioned.

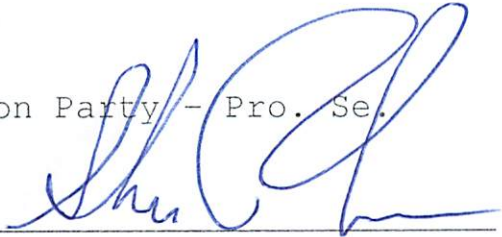
28 U.S.C. § 1927 (1980) provides for sanctions to "deter frivolous litigation and abusive practices by attorneys.

Non Party Richeson moves that this Court sanction attorney Joel Robbins \$1000.00, to be paid into the registry of this Court, and further donated to the US Office of the crime victims assistance fund, as provided for by the US PATRIOT Act of 2001.

Non Party Richeson moves that this Court order Joel Robbins to destroy the data on those 15 certain hard drives, and file evidence with this Court confirming completion of this act.

Respectfully submitted to this honorable Court  
this 3rd day of May 2016.

Non Party - Pro. Se.



---

Shawn A. Richeson  
1906 Twilight Drive  
Killeen, Texas 76543  
(254) 230-9311 - work  
Shawn@ClickaNerd.com

CERTIFICATE OF SERVICE

I, Shawn A. Richeson do hereby certify a  
true and correct copy of this document was  
served upon all parties and attorneys as  
required under the FRCP on: 05/03/2017



---

Shawn A. Richeson



# EXHIBIT 1

## EXISTING HARD DRIVE IMAGES MADE BY FLASHBACK DATA

2 messages

Shawn Richeson <admin@clickanerd.net>

Wed, Apr 19, 2017 at 7:39 PM

To: "joel@robbinsandcurtin.com" <joel@robbinsandcurtin.com>, Matt Danner <matt@flashbackdata.com>, info@flashbackdata.com, Jack St John <jjbs58@gmail.com>, "mcs@jaburgwilk.com" <mcs@jaburgwilk.com>, Angela Campbell <angela@dickeycampbell.com>, Kristopher Madsen <Kristopher.Madsen@stuarttinley.com>, John Brewington <paladin@paladinpi.com>, Cricket Bourget <cricket@robbinsandcurtin.com>

Joel,

Just checked on Pacer today, and it would appear that the USDC Judge signed a mutual settlement agreement and dismissed the case in Iowa.

If you give me your word that you will destroy the drive images or have your tech do it, I will not need any hearing in that Court or elsewhere over the matter.

If this is agreed to, please let this email serve as our certificate of conference, and bid you a fair well.

COURT ORDER USDC IOWA HERE:

<http://www.clickanerd.com/forums/uploadfolder/IOWA-MAGEDSON-V-SMITH-DISMISSED.pdf>

Respectfully,

—

Shawn Richeson  
1906 Twilight Drive  
Killeen TX 76543  
(254) 230-9311 - Work  
[www.clickanerd.com](http://www.clickanerd.com)  
[www.paypal.me/clickanerd](http://www.paypal.me/clickanerd)

Joel Robbins <joel@robbinsandcurtin.com>

Wed, Apr 19, 2017 at 8:05 PM

To: Shawn Richeson <admin@clickanerd.net>, Matt Danner <matt@flashbackdata.com>, "info@flashbackdata.com" <info@flashbackdata.com>, "mcs@jaburgwilk.com" <mcs@jaburgwilk.com>, Angela Campbell <angela@dickeycampbell.com>, Kristopher Madsen <Kristopher.Madsen@stuarttinley.com>

Shawn:

I paid \$6,000 for those disks. If you want to pay for them, I'll talk with my client about allowing you to have them. Otherwise, I'll retain them because I suspect that you will be litigating against the Ripoff Report again and I don't suspect that you will retain them. Additionally, you waived any objections to the production by choosing to run off on a vacation instead of participating in the scheduled Federal hearing. Had the judge limited discovery, I could have cancelled the duplication. You didn't attend and we had to pay \$6,000. You have also said that you filed a motion with the court that the court has not received. In other words, the disks are mine.

If you have a proposal, I'm willing to listen. Otherwise, I'll safeguard the disks.

Thank you.

*This is A  
Federal CRIME  
Witness INTIMIDATION  
18 USC 1512*



Joel B. Robbins

**Robbins & Curtin, pllc**

301 E. Bethany Home Rd.

Suite B-100

Phoenix, Arizona 85012

T (602) 285-0100

joel@robbinsandcurtin.com

**From:** Shawn Richeson [mailto:admin@clickanerd.net]

**Sent:** Wednesday, April 19, 2017 6:40 PM

**To:** Joel Robbins <joel@robbinsandcurtin.com>; Matt Danner <matt@flashbackdata.com>; info@flashbackdata.com; Jack St John <jjbs58@gmail.com>; mcs@jaburgwilk.com; Angela Campbell <angela@dickeycampbell.com>; Kristopher Madsen <Kristopher.Madsen@stuarttinley.com>; John Brewington <paladin@paladinpi.com>; Cricket Bourget <cricket@robbinsandcurtin.com>

**Subject:** EXISTING HARD DRIVE IMAGES MADE BY FLASHBACK DATA

[Quoted text hidden]

PRESS FIRMLY TO SEAL

PRESS FIRMLY TO SEAL

PRIORITY MAIL  
POSTAGE REQUIRED

# PRIORITY<sup>®</sup> ★ MAIL ★

DATE OF DELIVERY SPECIFIED \*



USPS TRACKING<sup>™</sup> INCLUDED \*

INSURANCE INCLUDED \*

PICKUP AVAILABLE

\* Domestic only

WHEN USED INTERNATIONALLY,  
A CUSTOMS DECLARATION  
LABEL MAY BE REQUIRED.

|                                                                                                                                        |  |
|----------------------------------------------------------------------------------------------------------------------------------------|--|
| <br><b>Click-N-Ship<sup>®</sup></b>               |  |
| USPS.COM 9405 5036 9930 0033 2184 64 0055 2401<br>US POSTAGE \$6.65<br>Flat Rate Env                                                   |  |
| Mailed from 76543 062500000001311 05/03/2017                                                                                           |  |
| <b>PRIORITY MAIL 3-DAY<sup>™</sup></b>                                                                                                 |  |
| SHAWN A RICHESON<br>CLICKANERD.COM<br>1906 TWILIGHT DR<br>KILLEEN TX 76543-7944<br>0006                                                |  |
| Carrier - Leave if No Response<br><b>C001</b>                                                                                          |  |
| SHIP TO: CLERK OF COURT<br>111 7TH AVE SE<br>STE 12<br>CEDAR RAPIDS IA 52401-2103                                                      |  |
| USPS TRACKING #<br><br>9405 5036 9930 0033 2184 64 |  |
| Electronic Rate Approved #038555749                                                                                                    |  |

5/3/17  
gm

UNITED STATES  
POSTAL SERVICE<sup>®</sup>  
VISIT US AT **USPS.COM<sup>®</sup>**  
ORDER FREE SUPPLIES ONLINE



EP14F July 2013  
OD: 12.5 x 9.5